

OUTTEN & GOLDEN LLP  
Cara E. Greene  
Maya S. Jumper  
Shira Z. Gelfand  
685 Third Avenue, 25th Fl.  
New York, NY 10017

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

v.

Civ. Action No. 19-cv-8655 (LGS)(GWG)

GOOGLE LLC,

Defendant.

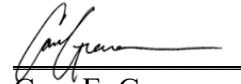
**PLAINTIFF'S MOTION FOR LEAVE TO FILE SUPPLEMENT PLEADINGS**

Pursuant to Rule 15(d) of the Federal Rules of Civil Procedure, Plaintiff, by and through her undersigned counsel, moves this Court for leave to file the Proposed Supplemental Complaint, Exhibit 1, to include supplemental retaliation claims arising from factual events that occurred after the filing of Plaintiff's Amended Complaint, ECF No. 12. The Proposed Supplemental Complaint is attached as Exhibit 1. Pursuant to Your Honor's Individual Practice Rule 2, Plaintiff has conferred with Defendant, and Defendant does not consent to this motion.

The grounds for this Motion are set forth in the Plaintiff's Memorandum in Support of Plaintiff's Motion for Leave to Supplement Pleadings, ECF No. 77.

Dated: New York, New York  
December 15, 2020

Respectfully submitted,

  
\_\_\_\_\_  
Cara E. Greene

Cara E. Greene  
Maya S. Jumper  
Shira Z. Gelfand  
**OUTTEN & GOLDEN LLP**  
685 Third Avenue, 25th Floor  
New York, NY 10017  
Telephone: (212) 245-1000  
Facsimile: (646) 509-2071  
ceg@outtengolden.com  
mjumper@outtengolden.com  
sgelfand@outtengolden.com

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 15, 2020, I filed the foregoing document using the Court's CM/ECF filing system, which will automatically send e-mail notification of such filing to the following individuals of record:

Kenneth W. Gage  
Sara B. Tomezsko  
PAUL HASTINGS LLP  
200 Park Avenue  
New York, NY 10166  
[kennethgage@paulhastings.com](mailto:kennethgage@paulhastings.com)  
[saratomezsko@paulhastings.com](mailto:saratomezsko@paulhastings.com)

*Attorneys for Defendant*

/s/ Cara E. Greene  
Cara E. Greene